

**REMARKS**

Claims 1-41 are currently pending. Claims 1, 6, 11 and 19 have been amended. Claims 24-41 are new. No new matter has been added.

**Claim Rejections Under 35 U.S.C. §101**

Claims 1-23 were rejected under 35 U.S.C. §101 for being directed to non-statutory subject matter. In response, these claims have been amended to address the rejection, without acquiescence or prejudice to pursue the original claims in a related application.

Hence, Applicant respectfully requests reconsideration of the claims and withdrawal of the rejections under 35 U.S.C. §101.

**Claim Rejections Under 35 U.S.C. §103**

Claims 1-23 were rejected under 35 U.S.C. §103(a) as unpatentable over Beakes (US 6,131,182) in view of Jess (US 2004/0002844). Applicant respectfully traverses.

Independent claim 1 recites the following limitations (emphasis added):

determining at least a plurality of *different arrival times and different slews* of timing events based on a timing model of a gate;

selecting a worst-case timing event from the plurality of timing events based on at least the *combination of the different arrival times and different slews* of the timing events; and  
storing information related to the worst-case timing event.

Applicant respectfully submits that Beakes in view of the ancillary Jess reference fails to disclose each and every limitation of the present claims in a manner as recited therein.

In col. 9, lines 21-27, Beakes suggests selecting a timing input signal that arrives last or latest during normal operation. Beakes discloses that the delay of a gate depends on the pattern of inputs, and a worst-case delay path is identified by generating input patterns to achieve the worst-case performance. However, as conceded by the Action, Beakes fails to disclose or suggest determining slews of timing events, as recited in the present claims. Moreover, Beakes fails to disclose or suggest combining the arrival time of the timing input signal with any other timing parameter to determine the worst-case delay path or performance.

The Action purports that Jess discloses slew. However, Applicant respectfully asserts that the ancillary Jess reference does not remedy the deficiencies of Beakes.

In paragraph 5, Jess discloses that a gate delay model comprises a model for the delay and slew for every valid input-to-output transition. Even though Jess discloses slew, Jess fails to disclose that the slew for each transition can be different. Moreover, Jess fails to disclose or suggest combining the slew for the transition with an arrival time to determine a worst case timing event, as recited in the present claims.

In contrast to both Beakes and Jess, independent claim 1, as amended, recites determining a plurality of *different arrival times and different slews* of timing events and selecting a worst-case timing event from the plurality of timing events based on the *combination of the different arrival times and different slews* of the timing events.

For at least these reasons, it is respectfully submitted that independent claim 1 is not anticipated by the cited references.

For at least these same reasons, it is respectfully submitted that independent claims 6, 11, 19, 29 and 33 are likewise not anticipated by the cited references.

Since the remaining claims depend from these independent claims 1, 6, 11, 19, 29 and 33, respectively, these remaining dependent claims are also not anticipated and are therefore allowable over the cited references.

**CONCLUSION**

Based on the foregoing, all claims are believed allowable, and an allowance of the claims is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

The Commissioner is authorized to charge any fees due in connection with the filing of this document to Bingham McCutchen's Deposit Account No. 50-2518, referencing billing number 7017522001. The Commissioner is authorized to credit any overpayment or to charge any underpayment to Bingham McCutchen's Deposit Account No. 50-2518, referencing billing number 7017522001.

Respectfully submitted,  
Bingham McCutchen LLP

Date: February 26, 2007

By:   
Jeffrey A. Hopkins  
Registration No. 53,034

Three Embarcadero Center  
San Francisco, CA 94111  
Telephone: (213) 680-6400  
Facsimile: (213) 680-6499